



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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July 8, 1997

Elaine J. Dorward-King, Ph.D.
Kennecott Utah Copper
8315 West 3595 South
P.O. Box 6001
Magna, Utah 84044-6001

Re: Request for Updated Large Mining Notice of Intention, Kennecott Utah Copper (KUC),
Bingham Canyon Mine, M/035/002, Salt Lake County, Utah

Dear Ms. Dorward-King:

This letter is a follow up to our June 11, 1997, discussion of the Bingham Canyon permit made during our field tour of the south end mine facilities area. As mentioned to you informally, the Division considers the Notice of Intention (NOI) for the Bingham Canyon Mine (M/035/002) to be lacking specific details describing the current operations and proposed reclamation. As you know, the original NOI was filed 21 years ago (August 9, 1976), one year after enactment of the Utah Mined Land Reclamation Act. The original NOI included very general descriptions of the proposed mining and reclamation activities. The original plan described the operations under seven (7) basic areas as follows: Mine area, Mine Waste Disposal area, Excess Mine Water Disposal area, Ore Transfer-Mine to Process area, Ore Processing Facilities area, Tailing Disposal area, and Excess Process Water Disposal area.

Those original descriptions do not adequately describe the current state of operations, especially in light of the operational and reclamation changes made during the past 21 years. The original NOI included very general reclamation commitments with no detailed plans describing how specific facilities or features would be reclaimed. A commitment was made to conduct ongoing reclamation research in order to provide more specific reclamation plan details in the future. KUC has completed a number of very successful reclamation research/test projects over the years under difficult reclamation scenarios. A significant amount of reclamation knowledge and experience has been gained which can now be used as a basis for developing more detailed reclamation plans for this mine site.

Substantial changes have occurred at the mine since the original permit application was approved. Very few permit revision or amendment applications have been filed with the Division to document these changes and update the mine plan. The Division requests that KUC consolidate and *update* the original mining and reclamation plan for the Bingham Canyon Mine to include the following:



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1. A complete description of the current mining operations.
2. A description of the reclamation activities that have taken place within the permit area.
3. A detailed reclamation plan for the existing mine facilities and disturbed areas.
4. A detailed reclamation cost estimate which is tied to the revised reclamation plan.

For clarity and consistency, we request that the Bingham Canyon mine permit application be updated and reformatted according to the provisions of the current Minerals Rules. Where possible, we request that KUC provide information to address all sections of the current rules. Generation of new background information will not be required for those areas of the original permit which have remained totally unchanged. If information is requested that was not required under the old rules, we will not require that new background information be generated. This request is not intended to be a new permit review or a retroactive application of the new rules to the entire Bingham Canyon permit. We are trying to uniformly apply the statute and rules in a consistent manner to the mining industry and bring a 21 year old permit application up to date.

The Division now has a recent series of surface facilities maps outlining the existing operations. These maps do not show the proposed Bingham Canyon fill area(s), or the new main access road being constructed to the mine. An updated map of appropriate scale showing these (and any other) new features is requested. The Division has approved five NOI's for KUC's operations (including Barney's Canyon Mine). Please provide a map keyed to each of the approved permit areas which clearly identifies each permit area covered under each separate reclamation surety.

I and my staff are available to meet and discuss this matter with you if you wish. However, it is clear that KUC needs to begin a good faith effort at updating the Bingham Canyon Permit to maintain compliance with the rules of the Mined Land Reclamation Act. I can be reached at (801) 538-5286.

Sincerely,



D. Wayne Hedberg
Permit Supervisor
Minerals Regulatory Program

jb

cc: Mary Ann Wright, DOGM
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